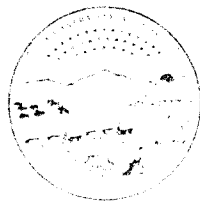


STATE OF KANSAS



DEPARTMENT OF HEALTH AND ENVIRONMENT

Forbes Field

Topeka, Kansas 66620-0001

Phone (913) 296-1500

Mike Hayden, Governor

Stanley C. Grant, Ph.D., Secretary

Gary K. Hulett, Ph.D., Under Secretary

November 15, 1988

Mr. Robert Baird
Environmental Engineer
GM-CPC Fairfax II Plant
3201 Fairfax Trafficway
P.O. Box 15278
Kansas City, Kansas 66115-1307

Re: Closure Certification at GM-CPC Fairfax I Plant
EPA I.D. Number KSD007145899

Dear Mr. Baird:

Closure certification information submitted by General Motors on September 21, 1988 has been reviewed. Our comment letter of August 25, 1988 on Section 5.0 of the report - "Site Investigation Results," still has not been satisfactorily addressed.

Table 2 from the USGS publication which was enclosed with your letter provided data on two regions of the United States-western and eastern. We do not feel that data collected and statistically analyzed for the entire eastern half of the United States provides accurate data for the specific area in which the plant is located.

Figure 21 is not legible enough to clearly ascertain data from. Your letter stated this figure indicated that samples collected in northeastern Kansas and northwestern Missouri generally exhibited lead concentrations in excess of 20 ppm. This is a point value and not a range of values as was requested. Also, how many samples are you considering as being in northeastern Kansas and northwestern Missouri? Figure 21 appears to show four to five samples collected in this region. Four to five samples collected over the area in question would not seem to be a large enough body of data from which solid statistical conclusions could be drawn.

Unless, GM can provide KDHE with more comprehensive information on naturally occurring lead levels in soils located in the specific region of the facility, the values obtained from background samples



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levels. This could possibly disallow GM from obtaining a clean closure at the drum storage pad based on closure activities of last March.

Please provide us with the requested information by December 15, 1988. KDHE will make a final decision on the acceptability of clean closure at the site after reviewing any new information submitted by GM by that date. If you have any questions please call me at (913) 296-1612.

Sincerely,

Brenda Clark

Brenda Clark
Environmental Engineer
Hazardous Waste Section
Bureau of Waste Management
sc/GMLTR.bc
C Wes Bartley ✓
Jim Fischer